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19 UNITED STATES DISTRICT COURT
 20 NORTHERN DISTRICT OF CALIFORNIA
 21 SAN FRANCISCO DIVISION

22 NATIONAL TPS ALLIANCE, MARIELA
 23 GONZÁLEZ, FREDDY JOSE ARAPE RIVAS,
 24 M.H., CECILIA DANIELA GONZÁLEZ
 25 HERRERA, ALBA CECILIA PURICA
 26 HERNÁNDEZ, E.R., HENDRINA VIVAS
 27 CASTILLO, A.C.A., SHERIKA BLANC, VILES
 28 DORSAINVIL, and G.S.,

Plaintiffs,

vs.

KRISTI NOEM, in her official capacity as
 Secretary of Homeland Security, UNITED
 STATES DEPARTMENT OF HOMELAND
 SECURITY, and UNITED STATES OF
 AMERICA,

Defendants.

Case No. 3:25-cv-01766-EMC

**STIPULATION REGARDING MOTION
 TO DISMISS AND CROSS SUMMARY
 JUDGMENT MOTION BRIEFING
 SCHEDULING AND [PROPOSED] ORDER**

Assigned to: Hon. Edward M. Chen

Complaint filed: February 19, 2025

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1 Pursuant to Civ. L.R. 6-2 and 7-12, the parties, by and through their respective counsel,
 2 submit this stipulation regarding the due date for Plaintiffs' Motion for Summary Judgment and the
 3 briefing schedule for Defendants' Motion to Dismiss.
 4

5 **WHEREAS**, on April 29, 2025, Defendants filed a Motion to Dismiss. Dkt. 122;
 6 **WHEREAS**, the hearing on Defendants' Motion to Dismiss was initially set for June 12,
 7 2025, with Plaintiffs' Opposition due May 13, 2025, and Defendants' Reply due by May 20, 2025;

8 **WHEREAS**, on May 5, 2025, this Court *sua sponte* rescheduled the hearing on Defendants'
 9 Motion to Dismiss from June 12, 2025 to July 11, 2025;

10 **WHEREAS**, on April 30, 2025, this Court set a briefing schedule for the Parties' Cross
 11 Motions for Summary Judgment pursuant to the Parties' stipulation, which inadvertently set May 26,
 12 2025, Memorial Day, as the due date for Plaintiffs' Motion for Summary Judgment. Dkt. 124;

13 **WHEREAS**, the parties respectfully request that the Court grant the following stipulated
 14 briefing schedule for the parties' forthcoming Motion to Dismiss briefing and Plaintiffs' forthcoming
 15 Motion for Summary Judgment.

16 **IT IS HEREBY STIPULATED AND AGREED**, by the parties and subject to the approval
 17 of the Court:

- 18 • Plaintiffs shall file their Motion for Summary Judgment by May 27, 2025.
- 19 • Plaintiffs shall file their Opposition to Defendants' Motion to Dismiss by May 28, 2025.
- 20 • Defendants shall file their Reply in Support of their Motion to Dismiss by June 10, 2025.
- 21 • The briefing schedule for the parties' Summary Judgment Motions will otherwise remain the
 22 same.

23 IT IS SO STIPULATED.

24
 25
 26 Respectfully submitted,
 27

1 Date: May 9, 2025

ACLU FOUNDATION
OF NORTHERN CALIFORNIA

2
3 Date: May 9, 2025

/s/ Emilou MacLean
Emilou MacLean
Attorneys for Plaintiffs
U.S. DEPARTMENT OF JUSTICE

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5
6

/s/ Sarah L. Vuong
Sarah L. Vuong
Attorneys for Defendants

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8 **SIGNATURE ATTESTATION**

9 Pursuant to Civil Local Rule 5-1(i)(3), I hereby attest that each of the other Signatories have
10 concurred in the filing of this document.

11
12 ACLU FOUNDATION
13 OF NORTHERN CALIFORNIA

14 /s/ Emilou MacLean
15 Emilou MacLean

16
17 **[PROPOSED] ORDER**

18 PURSUANT TO STIPULATION, IT IS SO ORDERED.

19
20 Dated: _____, 2025

21 The Honorable Edward M. Chen
22 United States District Judge